Crimin	Case 3:07-cr-00167 al Case Cover Sheet	7-L Document 1 Filed 05/22/2007 Pag	ge 41 of 4Revised 3/5/98
	TED STATES DISTRICT COU		15.00
NOF	CHERN DISTRICT OF TEX	Superseding Indicument. Last Yes LAST No New Dete	1
1.	Defendant Information	Pending CR Case in NDTX: Yes X No If Ye	
	Juvenile: Yes X No	Search Warrant Case Number	
	If Yes, Matter to be sealed:	R 20 from District of	<del></del>
	Yes No	Magistrate Case Number:	
	Defendant Name	WILLIAM FREDERCICK COLEMAN III	(3)
	Alias Name		
	Address	A A BY A D	
		. 807 CR	-167-L
	County in which offense was con	mmitted:Dallas	
2.	U.S. Attorney Information		
	Lynn Hastings	Bar # <u>09209700</u>	
	*		
3.	Interpreter		
	Yes X No If Yes,	list language and/or dialect:	
4.	Location Status		
	ISSUE ARREST WARRANT		
	Already in Federal Custody		
	☐ Already in State Custody ☐ On Pretrial Release		
5.	U.S.C. Citations		
J.		endant: 7 Petty Misdemea	anor X Felony
	Total # of Counts as to This Defe		Standard Control of Co
	Citation	Description of Offense Charged	Count(s)
	18 U.S.C. § 371	Conspiracy	
	18 U.S.C. §§ 666(a)(1)(B) and 2	Bribery and Aiding and Abetting	2
	18 U.S.C. §§ 666(a)(2) and 2	Bribery Concerning Programs Receiving Federal Funds, Aiding and Abetting	6
	18 U.S.C. § 1956(h)	Conspiracy to Launder Monetary Instruments	10
	18 U.S.C. § 1512(c)	Obstructing & Impeding an Official Proceeding	11-12
	18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461 (18 U.S.C. § 982 (	Forfeiture Allegation (a)(1))	16
	Date 5/22/07	Signature of AUSA:	Ho

Exhibit 5 To Attachment to Proof of Claim of United States of America in <u>In re Lakehills Consulting</u>, <u>L.P.</u>, Case No. 09-34049 (Bankr. S.D. Tex.)

1

## UNITED STATES DEPARTMENT OF JUSTICE

IN RE:

CIVIL INVESTIGATIVE

DEMAND

)

NO. 07-15

\*\*\*\*\*\*\*\*\*\*\*\*\*

SWORN TESTIMONY OF:

STEVE KIM

OCTOBER 24, 2007

\*\*\*\*\*\*\*\*\*\*\*

SWORN TESTIMONY OF STEVE KIM, produced as a witness at the instance of the United States Department of Justice and duly sworn, was taken in the above-style and numbered cause on October 24, 2007, from 2:24 p.m. to -5:49 p.m., before Sara T. Green, CSR, in and for the State of Texas, reported by machine shorthand, at the offices of the United States Attorney's Office, 919 Milam, Suite 1500, Houston, Texas, pursuant to the Federal Rules of Civil Procedure.

ALLEGRO 440 Louisiana REPORTING Houston, TX

SERVICE, X 77002 INC., 713/227-8404



	1	A. I don't recall ever being there, no.
	2	MS. VENEZIA: Did you is it possible
	3	that you would have gone to Vegas more than once in the
	4	year?
04:13:51	5	A. Sure.
	6	MS. VENEZIA: And would it have been
	7	obviously for one trip it would have been Convex.
	8	A. Right.
	9	MS. VENEZIA: What would the other trip
04:14:01	10	have been? Were there other conventions out there?
	11	A. No, I mean, Convex is pretty much the big one
	12	for the technology area but, you know, I would have been
	13	there socially.
	14	MS. VENEZIA: And when you were there
04:14:12	15	socially would you have socialized with Shearrard Thomas
	16	or Frankie Wong or Bill Edwards?
8	17	A. Yes. With Frankie Wong. I don't recall
	18	Shearrard a whole lot but with Frankie, yes.
	19	MS. BROOKS: What was the reason for that?
04:14:30	20	Can you tell us about how many trips were there like
	21	that?
	22	A. A handful. Five, six.
	23	MS. BROOKS: They were all in Vegas?
	24	A. Yes.
04:14:44	25	MS. BROOKS: This is socially so this was

	1	outside so were they on weekends? Did you take off from
	2	work?
	3	A. They would have been on weekends.
	4	MS. BROOKS: Who went?
04:14:53	5	A. Me, Frankie was usually there, Kim I think his
	6	assistant was usually there.
	7	MS. BROOKS: Do you know her last name?
	8	A. Ngang, N-G-A-N-G, I think is what it is. Bill
	9	Froechtenicht, I don't know how to spell it. There is a
04:15:14	10	lot of syllables in there. Ron LeSard.
	11	MS. BROOKS: So these were on the weekends?
	12	A. Yes.
	13	MS. BROOKS: Who paid for your trip there?
TI	14	A. Well, as I understand it, you know, the first
04:15:33	15	the first time was the first few times were travel
	16	vouchers. I mean, he had, you know, as I understand it
	17	he's a big gambler and he gets, you know, comp'd rooms.
	18	He has a huge stack of travel vouchers.
	19	MS. BROOKS: "He"?
04:15:46	20	A. Frankie Wong has just a huge stack of travel
	21	and drink vouchers. I mean, it's like three feet high,
	22	you know, in multiple stacks against his wall.
	23	MS. BROOKS: So your trip to Vegas those
	24	times was paid for by Frankie Wong via travel vouchers?
04:16:03	25	A. Well, yes, but they were all there was no

.1	out of pocket for his flights or the rooms.
2	MS. BROOKS: But it was not your pocket?
3	A. That is correct.
4	MS. BROOKS: What about your hotel?
04:16:15 5	A. Those were comp'd.
6	MS. BROOKS: Food?
7	A. Sometimes I would, but we also had since we
8	were a line voucher or something that allowed us to go
9	in and eat as well.
04:16:36 10	MS. VENEZIA: Did you ever take a trip
11	other than to Las Vegas or Austin that involved Frankie
12	Wong or Shearrard Thomas?
13	A. Yes.
14	MS. VENEZIA: Where would that have been?
04:16:50 15	A. That was Miami.
16	MS. VENEZIA: What was that for?
17	A. That was just a social trip as well, just out
18	having fun. There was a huge gathering of people there.
19	There must have been 12, 15 people there.
04:17:02 20	MS. VENEZIA: Do you remember who was there
21	other than yourself and I'm assuming Frankie Wong but
22	you also mentioned Shearrard Thomas so I don't know if
23	he was there or not. Can you confirm that he was either
24	there or he wasn't?
04:17:15 25	A. Shearrard Thomas was there with a bunch of his

	1	friends.
	2	MS. VENEZIA: And do you remember names of
	3	people that were there other than Shearrard Thomas and
	4	Frankie Wong?
04:17:25	5	A. Kim was there, Kim Ngang. Bill Froechtenicht
	6	was there. Shearrard's friend Reggie was there.
	7	MS. VENEZIA: Do you know his last name?
	8	A. No, I don't.
	9	MS. CHORPENING: Ledey?
04:17:37	10	A. I don't know. It's a close friend of his is
	11	all I know, and they had about, you know, four or five
	12	people of their own. I didn't really get to meet I
	13	mean, I didn't spend a whole lot of time with them so I
	14	don't I didn't catch all their names.
04:17:56	15	MR. FERTITTA: Do you want to explain any
	16	further on that?
	17	A. Okay. Oh, yeah, but, you know, we did agree
	18	that, you know, this was well beyond any justifiable
	19	kind of business trip so I did give him a check. It was
04:18:16	20	like \$630 something dollars I think is what it was.
	21	MS. VENEZIA: For the Miami trip you mean?
	22	A. Yes, yes.
	23	MS. CHORPENING: Do you have a copy of that
	24	check?
04:18:25	25	A. I can look. I don't know. That's several

	1	years ago.
	2	MS. VENEZIA: When you say you gave them a
	3	check, who specifically did you give the check to and do
	4	you recall
04:18:31	5	A. Frankie Wong.
	6	MS. VENEZIA: Did you write it to him
	7	personally?
	8	A. Yes, I did.
	9	MS. VENEZIA: Do you know if he cashed it?
04:18:39	10	Do you recall if he cashed it?
	11	A. I don't recall. I don't know.
3	12	MR. FERTITTA: What year are we talking
	13	about?
9	14	A. '05 I think.
04:18:49	15	MS. BROOKS: You don't recall if \$600 came
3	16	out of your bank account?
3	17	A. My bank account is never balanced and I'm
	18	always off.
	19	MS. BROOKS: If \$600 came out of my account
04:18:58	20	or didn't I would know. You don't recall if \$600 came
12	21	out of your account?
1	22	A. Nothing beeps up at me so I would assume it
	23	would it did.
, 2	24	MS. VENEZIA: I'm sorry. Did you say
04:19:09 2	25	did you recall when you went to Miami?
	-	

	1	A. It was in '05, mid '05 I think.
	2	MS. CHORPENING: Did you take any boat
	3	rides?
	4	A. I did and I you know, there was two two
04:19:26	5	incidents, one around the marina in Miami and one with
	6	Bill Edwards that I was requested to go to and I spent,
400 u	7	you know, several hours down below decks wanting to die.
	8	I get I get very seasick.
	9	MS. CHORPENING: Was that the Sir Veza II?
04:19:52	10	A. I don't recall. They had like two incarnations
	11	of that I think. I don't know which one it was.
	12	MS. CHORPENING: But it was one of those?
	13	A. Yeah, it was one of those.
	14	MS. EVANS: The trip with Bill Edwards was
04:20:02	15	that also in Florida or somewhere else?
	16	A. No, that was here in Kemah or off the coast.
	17	MS. CHORPENING: Was Bill still working for
	18	HISD at the time?
y y	19	A. Yes, he was.
04:20:26	20	(Recess taken, from 4:20 p.m.
	21	to 4:25 p.m.)
	22,	MS. CHORPENING: So what year was it that
	23	you and Bill Edwards went out on the boat?
	24	A. I don't recall. It was very early on I
04:25:46	25	believe, 2000, 2001. I don't I honestly don't
	-	

	1	remember.
	2	MS. CHORPENING: Was there anyone else
	3	there? I mean, was Frankie Wong there?
	4	A. Oh, yeah, yeah, he was there. Laura Palmer was
04:26:16	5	there. I don't know beyond that if anyone joined later
	6	on. I was
	7	MS. CHORPENING: So this isn't the Kemah
	8	one that you have already
	9	A. Uh-huh.
04:26:30	10	MS. CHORPENING: So it was you and then
	11	Bill Edwards, Laura Palmer and Frankie Wong?
	12	A. I believe so.
	13	MS. CHORPENING: Were there any other HISD
	14	people there?
04:26:38	15	A. I don't recall any, no.
	16	MS. CHORPENING: Did Frankie ever talk
	17	about Ruben Bohuchot or it being Ruben's boat or
	18	anything like that?
	19	A. He said that Ruben was an avid fisherman and
04:26:58	20	boater.
	21	MS. CHORPENING: Did he talk about why he
	22	bought the boat at all?
	23	A. Do I answer that? He did make a statement that
	24	if it wasn't for Ruben he probably wouldn't have bought
04:27:29	25	the boat, but he also said that, you know, the MSE
	-	

1 families all take use of it and they all go out and do day trips. 3 MS. CHORPENING: Did you take a trip with Frankie to Detroit? 04:27:55 A. Yes. Several of us did. 6 MS. CHORPENING: What was that about? 7 I have no idea. We were told -- I was told to 8 go and it was I think -- I don't remember if -- I don't recall Bill being there but he must have been there. 04:28:10 10 Frankie was there. 11 MS. CHORPENING: Bill who? 12 Bill Edwards. I'm sorry. Bill Froechtenicht 13 was there, Laura Palmer was there. We met up -- we 14 ended up meeting with Charles Coleman and some lady who 04:28:26 15 was trying to set up a Help Desk or something or wanted 16 in with the City, and honestly it was so far beyond my 17 scope that I really don't know why I was there. It was 18 something about -- it was very political. That's all I 19 know. 04:28:42 20 MS. BROOKS: The lady was trying to set up 21 what? 22 Like a Help Desk. She showed us around this 23 building and she had all these grand design plans for it 24 and I think it was like going to be a Help Desk for the 04:28:54 25 City or something. I don't really recall what that was

```
1
             about. I honestly don't know why I was there.
                           MS. EVANS: City of Detroit or City of
        3
             Houston?
                  A. Detroit.
04:29:04
                           MS. CHORPENING: Was -- did you mean
             William Coleman, Charles?
        7
                  A.
                      Yes.
        8
                           MS. CHORPENING: Was he the -- did he have
             some position in Detroit at that point?
04:29:15 10
                      I only know that he later had a position. I
                  A.
       11
             don't know if he had that position at that time. We
       12
             ended up going to a dinner. Laura talked to him most of
       13
             the night. I was just decoration.
       14
                           MS. BROOKS: Who paid for that trip?
04:29:34 15
                      Again, Laura -- I think Laura -- Laura arranged
       16
             that one. I don't know. I got my tickets and went.
       17
                           MS. EVANS: You got your tickets from HISD?
                  A. From Laura. I mean, I think it was just a go
       18
       19
             there and it was a ticketless E-flight I think.
04:30:11 20
                           MS. CHORPENING: Did you go anywhere else
       21
             with Frankie Wong that we haven't talked about?
       22
                  A.
                      I don't recall any right now, no.
       23
                           MS. CHORPENING: Did you ever go to Key
       24
             West?
04:30:20 25
                  A.
                      No.
```

	1	MS. CHORPENING: Did you attend any
	2	concerts using tickets provided by MSE or ACS or HP?
	3	A. Concerts?
	4	MS. CHORPENING: Concerts.
04:49:19	5	A. Yes, there was one concert. It was I believe
	6	Linkin Park, I believe.
	7	MS. CHORPENING: Linkin Park?
	8	A. Yeah.
	9	MS. CHORPENING: Is that a band?
04:49:37	10	A. It's a band.
	11	MS. CHORPENING: What about Jimmy Buffett?
	12	A. No, I've never been to a Jimmy Buffett concert.
	13	MS. CHORPENING: Martina McBride?
	14	A. No.
04:49:53	15	MS. BROOKS: Who paid for the Linkin Park
	16	tickets?
	17	A. They had a suite and as I understood it the
	18	suite afforded them all the concert events.
÷	19	MS. BROOKS: "Them"?
04:50:03	20	A. Frankie and Frank Trifilio.
	21	MS. VENEZIA: Was that at Toyota
	22	A. Toyota. Now, I know that they talked about
	23	those concerts now that you mentioned it but I did not
	24	go.
04:50:20	25	MS. VENEZIA: I want to back up one more
	-	

	1	
	1	something like that.
	2	MS. CHORPENING: Who did you hear that
	3	from?
	4	A. I heard that from either Bill Froechtenicht or
05:07:51	5	Frankie Wong. I don't remember. It would have been in
	6	one of our weekly or bimonthly biweekly meetings.
	7	MS. CHORPENING: How many sporting events
	8	do you think you attended all together? Have we covered
	9	that?
05:08:06	10	MS. VENEZIA: I asked him about sporting
	11	events.
	12	A. I'm not a big sports fan honestly. If there
	13	was more than three I would be surprised.
	14	MS. CHORPENING: In terms of the Super Bowl
05:08:28	15	did they give you any idea of what the cost of the
	16	ticket was?
	17	A. No, they didn't.
	18	MS. CHORPENING: Did you put on your form
	19	what was on here? 16. Okay. You put \$200 on your
05:08:54	20	estimated value. Do you how did you come by \$200?
	21	A. That's something that, you know, Laura decided
	22	to put as a value.
	23	MS. VENEZIA: What's the date of that?
	24	MS. CHORPENING: 7/20/04. These are the
05:09:29	25	MS. VENEZIA: I just didn't know the date

	1	of the form.
	2	MS. CHORPENING: Yeah. So, yeah, it says
	3	
		basketball game in attendance with board members, HCC
	4	staff and City of Houston officials. Who were the City
05:09:45	5	of Houston officials there?
	6	A. I don't recall. The HCC staff I know was I
	7	believe Diane's husband.
	8 .	MS. CHORPENING: Diane's husband?
	9	A. Yes.
05:09:57	10	MS. BROOKS: That's it?
	11	A. I don't recall anybody else. There was a lot
	12	of people there, though.
	13	MS. CHORPENING: What is HCC?
	14	A. Houston Community College.
05:10:12	15	MS. CHORPENING: Did you discuss with Laura
	16	what you should put on this form?
	17	A. Yes, because I used her numbers as well.
	18	MS. CHORPENING: Well, she actually put
* # # B	19	down "don't know" for the football game.
05:10:30	20	A. That's the number she gave me. I put that
	21	down.
-	22	MS. CHORPENING: What kind of why did
	23	
		you discuss it with Laura what you should put on here?
	24	A. Well, she came to me and said, What are you
05:10:46	25	listing? I said the events that we attended. She said,

	1	What are you going to put for price? I said I don't
	2	know.
	3	MS. VENEZIA: What was your understanding
	4	of what obligation you had as far as disclosing what you
05:11:00	5	refer to as events you attended?
	6	A. I don't have a real clear idea of that.
	7	MS. VENEZIA: In your opinion were you to
	8	include lunches or dinners on those forms?
	9	A. That got clarified at the last one we signed
05:11:20	10	that said anything at all, even, you know, lunches and
	11	dinners but, you know, a lot of it is just really, you
	12	know, like if we try to follow by example it gets really
	13	muddy and not very clear because, you know, board
	14	members are going to events. Higher up officials, you
05:11:43	15	know, the chief business officers are going on events
	16	and, you know, if you're being instructed to go to these
	17	events, you know, there is really no clear cut policy on
	18	that. It's just
	19	MS. VENEZIA: Well, I don't have a copy of
05:11:59	20	your 2004 disclosure in front of me but I'm not sure how
	21	many events were disclosed there. How many were there?
	22	MS. CHORPENING: Four.
	23	MS. VENEZIA: What were they?
	24	MS. CHORPENING: The staff dinner, the
05:12:14	25	Hewlett-Packard staff lunch at Fogo de Chao

1	A. That was yes, that's that one.
2	MS. CHORPENING: the ACS/MSE basketball
3	game and the ASC/MSE Super Bowl game.
4	A. Excuse me. If does Laura's also reflect
05:12:30 5	Fogo de Chao also?
6	MS. CHORPENING: Laura's does.
7	A. So it wasn't just me and Shearrard?
8	MS. CHORPENING: Although she lists her
9	lunch at 28.50 and yours is at 45.
05:12:42 10	A. I know the dinner price is \$45.
. 11	MS. CHORPENING: Yeah. I think the lunch
12	is too, actually.
13	MS. VENEZIA: There is also in HP's
14	disclosures have you going to Uptown Sushi with
05:13:00 15	Shearrard Thomas on February 24th of '04, on May 18th of
16	'04, along with Frankie Wong on that occasion; and again
17	on November 4th or, I'm sorry, November 20th of '04
18	again with Frankie Wong.
19	Would that have been something you felt you
05:13:26 20	should have disclosed on those forms?
21	A. I don't recall ever going to Uptown Sushi with
22	Shearrard Thomas.
23	MS. VENEZIA: In '05 do you recall
24	MS. CHORPENING: What about with Frankie
05:13:45 25	Wong?

```
1
                       I've been there with him once, yes. No, twice,
         2
              twice, twice.
         3
                            MS. VENEZIA: In '04 or --
                       Well, the second time I don't really know if we
05:13:55
        5
              could even call it that because he was there when I
         6
              showed up with a friend as well, so, you know --
        7
                            MS. VENEZIA: Did you pay for your lunch on
             that occasion?
                       Yeah, I did, but, you know, I was there with
05:14:05 10
             him, so I don't know if that counts. But I also saw
        11
             Kevin Hoffman there with him as well, or he was there.
        12
              I don't know if they were together.
        13
                            MS. CHORPENING: At Uptown Sushi?
        14
                   Α.
                       Yes.
05:14:29 15
                            MS. CHORPENING: Who was he with?
        16
                       I don't know if they were together or not but
        17
             they were talking at that time.
        18
                            MS. CHORPENING: I mean, who was Kevin
        19
             Hoffman with? Frankie Wong?
05:14:38 20
                   A. He was talking with Frankie Wong, yes.
                            MS. CHORPENING: Was it odd for the board
        21
        22
             members to get so involved in vendors, technology
        23
             vendors?
        24
                   A.
                      I've never seen them involved with any other
05:14:54 25
             vendors.
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1
                            MS. VENEZIA:
                                          Did you happen to keep copies
        2
             of any disclosures you gave to HISD?
        3
                  A. No, I did not.
        4
                            MS. VENEZIA:
                                          When we began and I asked you
05:15:34
        5
             why you left HISD you said for other opportunities.
        6
                  Α.
                      Yes.
        7
                            MS. VENEZIA:
                                          What were those opportunities
        8
             and did they work out or not work out?
                       It's a personal hobby of mine, passion of mine
        9
05:15:47 10
             which is photography.
        11
                            MS. VENEZIA: So you didn't have another
       12
             job offer that you were going to, it was something
       13
             personal?
       14
                      I wanted -- I just wanted out of this, you
05:15:55 15
             know, the whole uncomfortable atmosphere, writing
       16
             reports one after another. It was beyond what I wanted.
       17
             Now, they wanted me as a full-time writer because we had
        18
             lost -- we only had -- according to Laura we only had
             two writers in the whole department and that was her and
        19
05:16:17 20
             me, and she said she didn't have time to do it anymore
       21
             so she wanted me to, so I was stuck with writing all
       22
             reports. That's not what I want to do. You know, stick
       23
             me behind some servers or let me, you know, explore
       24
             other opportunities.
05:16:36 25
                            MS. CHORPENING: Do you know if Laura
```

	1	Palmer went to Seattle?
	2	A. Yeah. There was a convention I believe there.
	3	MS. BROOKS: What type of convention?
	4	A. This is the one that moves around the country
05:16:55	5	yearly and it's called it starts with an N, I
	6	believe. I don't recall the convention name. I haven't
	7	been actually, no, I have been to one and that's the
***	8	one in San Antonio I believe is where it was before and
	9	then it moves to like New Orleans and some other places
05:17:22	10	and then it went to Seattle and she wanted to go to the
	11	one in Seattle because I think she was from there at one
	12	time.
	13	MS. BROOKS: Was it a technology
	14	convention?
05:17:32	15	A. It was a technology convention but it's N
	16	something and I don't recall.
	17	MS. CHORPENING: Do you know if Laura
	18	Palmer went to any lunches or dinners without you being
	19	there with MSE or HP?
05:17:51	20	A. She she in Seattle she did. She I
-	21	think she was met by Shearrard over there.
	22	MS. CHORPENING: Does Laura Palmer have any
	23	children?
2	24	A. Two. One daughter, one son.
05:18:16	25	MS. CHORPENING: How old is the son?

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES, ex rel
RICHARDSON

VS.

CID DEPOSITION
ANALYTICAL COMPUTERS

\*\*\*\*\*\*\*\*\*\*\*

ORAL DEPOSITION OF

LARRY LEHMANN

NOVEMBER 19, 2008

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ORAL DEPOSITION of LARRY LEHMANN, produced as a witness at the instance of Plaintiff United States, and duly sworn, was taken in the above-styled and numbered cause on November 19, 2008, from 9:20 a.m. to 12:43 p.m., before Patricia L. Fairley, RPR, CSR in and for the State of Texas, reported by machine shorthand, at the U.S. Attorney's Office, 919 Milam Street, Suite 1500, Houston, Texas, pursuant to the Federal Rules of Civil Procedure.

ORIGINAL

the check, they said, "How are we going to get paid 1 back?" We called Frankie, and Frankie said, "Well, what 2 3 are other people making?" And that -- I wasn't -- this is kind of 4 5 fuzzy to me because I had about a thousand things going 6 on at this point, but according to Romaldo, that just --7 Frankie said, "Well, let's move him up to \$75 an hour," I think is what it ended up, and he would net at 7,500, 8 and the difference became the payment to the loan. 9 10 Q. Did Mr. Wong ever instruct you to or request 11 that you make a loan to anyone else through Acclaim? 12 Not that I recall. I mean, he may have, but I don't recall it. 13 14 0. Did Acclaim ever make a loan to Laura Palmer? 15 A. No. I did personally. 16 Q. You did personally. When was that? 17 That's in the copies there I thought y'all Α. 18 would already have. Maybe in July of '05, maybe. 19 0. Well, is Ms. Palmer still employed by HISD? A. Uh-huh. 20 21 Why did Ms. Palmer request a loan from you? 0. 22 She called and -- called me and said that her A. son was in big trouble, he had to go to some kind of 23 24 treatment, and if he didn't, he was going to go to jail, 25 can I make the first month's payment for her.

0. And how much was that payment? 1 \$6,700, maybe. 6,750. The check's in there. 2 A. 3 I even wrote "Loan 1" on it because I didn't know if there was going to be a second one. 4 Were you surprised that Laura Palmer would call 5 you and ask for a loan? 6 7 We were pretty good friends. I mean, I would 8 hope a friend would do that if she's -- I mean, I have what I call business friends and I have personal 9 10 friends. And Stephanie and Romaldo that y'all talked 11 to, I call them business friends and they're as close to me as anybody, but I don't know where they live. I 12 don't -- I don't go after work and do things with them, 13 but I call them business friends. 14 15 And -- and I consider Laura -- we've worked 16 together for seven or eight years, and, you know, I'm hoping if one of my kids were in trouble and I needed 17 some help, they'll give me a loan. 18 19 Well, was Laura Palmer a personal friend or a 20 business friend? I would call her a business friend. I don't go 21 over there much, if at all. 22 23 Do you make many loans to business friends? 0. 24 A. Sure. 25 How often has that happened in the last five Q.

1	years?	20
2	Α.	Five years? Four or five, six.
3	Q.	Anyone else employed by HISD?
4	Α.	(Witness shakes head.)
5	Q.	What about DISD?
6	Α.	(Witness shakes head.)
7	Q.	Any other public entity?
8	A.	Not that I know of.
9	Q.	Do you remember who the other individuals were
10	that you	made personal loans to that you would describe
11	as a bus	iness friend?
12	Α.	Yeah. Stephanie. Stephanie Shaw
13	Q.	Stephanie Shaw?
14	A.	Green.
15	Q.	Okay. When was that?
16	Α.	I don't know the exact date. I'm sorry. But
17	certainl	y within the last five years. She can give you
18	the	
19	Q.	Did she request the loan?
20	Α.	Uh-huh.
21	Q.	For how much?
22	Α.	I don't know that number. Sorry.
23	Q.	More than 50,000?
24	Α.	I don't think so.
25	Q.	More than 10,000?

1	A. Probably. One of my other, you know, people
2	who worked for me a long time wanted to pay off the car
3	because their loan was too high. Did that for them.
4	I
5	Q. Who was that?
6	A. I'm trying to think of her. If I had known
7	this would be a line of questioning, I would have come
8	up with the answers. I can get that to you. I'm sorry.
9	There's a guy by the name of Kevin
10	Winkelmann that has one. Right now, for instance, he
11	has one. He's not making his payments on time either.
12	He's not very
13	I'm sorry. I don't have the rest of the
14	names off the top
15	Q. That's all you can remember?
16	A. Well, off the top of my head.
17	Q. Okay. What
18	MR. LAIRD: Just a second.
19	MR. HOGAN: Of course.
20	MR. LAIRD: In the documents, there was
21	Eddie Hill.
22	A. Oh, Eddie Hill.
23	Actually, there was two to Laura Palmer, by
24	the way.
25	Q. (BY MR. HOGAN) Okay. And what was the second